

**UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA**

1. LADONNA PARIS, an individual

Plaintiff,

v.

Case No.: 4:22-CV-235-TCK-JFJ

1. RONNI CARROCIA, an individual;
2. DAYLAN ROOT, an individual;
3. TY BURNS, an individual;
4. CITY OF TULSA, a municipal
corporation;
5. GEORGE THERON BYNUM IV,
an individual;

Defendants.

**PLAINTIFF’S MOTION FOR EXTENSION OF TIME TO
RESPOND TO DEFENDANT BYNUM’S MOTION TO DISMISS**

Pursuant to LCvR 7 (g), Plaintiff respectfully submits this Motion for Extension of Time to Respond to Defendant George Theron Bynum IV’s Motion to Dismiss. In support of the extension, Plaintiff would state the following:

1. Defendant Bynum filed his Motion to Dismiss on July 5, 2022. [Dkt. #22].
2. Plaintiff’s response is due on or before July 26, 2022.
3. Plaintiff is requesting an extension of one week to respond to the motion to dismiss.
4. The extension of time is necessary due to difficulties involving both members of the law firm’s recent COVID exposures.

5. The requested extension is not made for purposes of delay and no party will be prejudiced should an extension be granted.
6. Given the early stage of the lawsuit, no scheduling order has been entered and no deadlines would be impacted should an extension be granted.
7. Plaintiff's counsel contacted Defendant Bynum's counsel to determine whether there was an objection to Plaintiff's motion for an extension. Defendant Bynum has no objection to Plaintiff's requested extension.
8. No previous motion for an extension has been requested by Plaintiff.
9. A proposed order is being provided for the Court's consideration.

Wherefore, Plaintiff respectfully requests the Court allow an extension of one week to file her response to Defendant Bynum's Motion to Dismiss.

Respectfully submitted,

BRYAN & TERRILL

s/Steven J. Terrill
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CERTIFICATE OF SERVICE

I certify that on the 25th day of July, 2022, a complete and accurate copy of the foregoing instrument was served electronically to the Clerk of the Court using the ECF system for filing and transmittal of a notice of electronic filing to the counsel of record in this case.

_____/s/Steven J. Terrill_____
Steven J. Terrill